

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ERIK STORM,)	
Plaintiff,)	
vs.)	
)	
NEIL ERICKSON,)	
In both his official capacity and individual)	
capacity as Police Chief of the City of)	C.A. No. 4:16-cv-40094-TSH
Gardner,)	
JAMES F. TRIFIRO,)	
In both his official capacity and individual)	
capacity as Police Officer for the City of)	
Gardner,)	
DYLAN BRYANT,)	
In both his official capacity and individual)	
capacity as Police Officer for the City of)	
Gardner,)	
JOSEPH WOLSKI,)	
In both his official capacity and individual)	
capacity as Police Officer for the City of)	
Gardner,)	
Defendants)	

**DEFENDANTS NEIL ERICKSON, JAMES F. TRIFIRO, DYLAN BRYANT AND
JOSEPH WOLSKI'S ASSENTED TO MOTION TO EXTEND THE SCHEDULING
ORDER BY NINETY DAYS**

NOW COME the defendants, Chief Neil Erickson (herein "defendant" or "Chief"), Sergeant James F. Trifiro (herein "defendant" or "Trifiro") Officer Dylan Bryant (herein "defendant" or "Bryant") and Officer Joseph Wolski in the above entitled matter and hereby move this Honorable Court to extend the Scheduling Order deadlines by ninety (90) days. As reasons therefore, the defendants state that the parties have been diligent in their efforts to complete discovery in the within action, exchanging their initial disclosures and paper discovery within the time frame designated by this Honorable Court in the Scheduling Order. However, the parties will not be able to complete all depositions by the February 28, 2017 deadline due, in part, to weather issues and scheduling conflicts of the parties that have prevented previously scheduled depositions from going forward.

The parties anticipate being able to complete all depositions by May 26, 2017 and serve any anticipated motions for summary judgment by June 30, 2017, with oppositions due twenty-one (21) days after service.

WHEREFORE, the defendants Chief Neil Erickson, Sergeant James Trifiro, Officer Dylan Bryant and Officer Joseph Wolski request this Honorable Court allow their assented to Motion to Extend the Scheduling Order by ninety (90) days.

DEFENDANTS,
By their attorney,

/s/ Courtney E. Mayo

Courtney E. Mayo, Esquire,
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Dated: February 28, 2017

ASSENTED TO BY:
ERIK STORM,
By his attorney,

/s/ J. Steven Foley

J. Steven Foley, Esquire
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CERTIFICATE OF SERVICE

I, Courtney E. Mayo, counsel for the defendants in the above-entitled matter, hereby certify that I have served a copy of the foregoing document upon all parties through the Electronic Case Filing system this 28th day of February 2017 to:

J. Steven Foley, Esquire
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/s/ Courtney E. Mayo
Courtney E. Mayo, Esquire